

COMMENTS FROM MARSHALL LEE, DEPARTMENT OF PESTICIDE REGULATION

From: Margie Lopez-Read
To: mlee@cdpr.ca.gov
Date: 7/3/2007 7:37:13 PM
Subject: Re: Reconsideration of Earlier Comments on Monitoring Review

>>> "Marshall Lee" <mlee@cdpr.ca.gov> 07/03/07 5:16 PM >>>

Margie:

In my comments to you regarding the draft "2007 Review of Monitoring Data," I questioned the rationale for using once-a-month sampling to determine compliance with water quality triggers that reflect numeric water quality objectives for chronic (4-day average) exposures. After I sent my comments, I thought about it a little more and consulted with Frank Spurlock, one of our statistically inclined staff. He reminded me that when he examined data from year-long monitoring studies of diazinon and chlorpyrifos in the San Joaquin Valley in the 1990s, he analyzed for autocorrelation among data. He found that data collected on consecutive days were autocorrelated; high concentrations tended to be associated with high concentrations on preceding or subsequent days. This suggests that it may not be inappropriate to use monthly grab samples as an indicator for exceedances of numeric water quality objectives for 4-day average exposures.

You can access Frank's analysis at <http://www.cdpr.ca.gov/docs/empm/pubs/ehapreps/eh0101.pdf>; the section on autocorrelation analyses is on page 13 and in figures 5 and 6. It may help support your decisions on which water quality triggers to use in the ILP.

I hope this is helpful to you and your staff. Feel free to contact me if you have any questions.

Regards,
Marshall

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